

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**GEORGIA SOUTHWESTERN
RAILROAD, INC., a Corporation**)

Plaintiff,)

v.)

2:06-CV-00003-DRB

AMERICUS C. MITCHELL, JR.,)

Defendant.)

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Comes now the Plaintiff, Georgia Southwestern Railroad, Inc., by and through their undersigned counsel, and submits the following proposed voir dire questions:

1. Has any member of the venire ever owned property managed specifically for timber production?
2. Does any member of the venire's family have experience in managing timberland?
3. Has any member of the venire ever had any experience in conducting a prescribed burn?
4. Does any member of the venire's family have experience in conducting a prescribed burn?
5. Has any member of the venire ever sustained a loss or damage to any property from fire?
6. This action involves a suit filed by Georgia Southwestern Railroad, a Corporation, against Americus C. Mitchell, Jr, an individual. Does any member of the venire believe a corporation should not seek compensation from an individual for damage to the corporation's property if the damage was caused by the individual's negligence?
7. How many members of the venire own their own homes?
8. How many members of the venire own any property other than their primary residence?

9. How many members of the venire maintain a homeowners insurance policy on their residence?
10. Does any member of the venire have experience in the railroad industry?
11. Has any member of the venire ever been in an accident involving a railroad or a train?
12. Does any member of the venire have any experience in the area of bridge repair or bridge construction?
13. Does any member of the venire have experience or training in fighting fires?

RESPECTFULLY SUMMITTED this the 21st day of May, 2007.

/s/ Adrian D. Johnson
ADRIAN D. JOHNSON (JOH172)
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Railroad, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following attorneys of record on this the 21st day of May, 2007.

David E. Allred
D. Craig Allred
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/s/ Adrian D. Johnson
OF COUNSEL